

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

DAVID VAN ELZEN, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

GLOBAL STRATEGY GROUP, LLC, a New
York limited liability company, and
AMERICAN DIRECTIONS RESEARCH
GROUP, INC., a Washington DC corporation,

Defendants.

Case No. 1:20-cv-03541-JPO

**DEFENDANT GLOBAL STRATEGY
GROUP, LLC'S NOTICE OF MOTION
TO DISMISS COMPLAINT**

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law in Support of Defendant's Motion to Dismiss the Complaint, dated October 15, 2021, and all pleadings, submissions and proceedings herein, Defendant Global Strategy Group, LLC ("Defendant") hereby moves this Court before the Honorable J. Paul Oetken, United States District Judge, at the United States District Court for the Southern District of New York, located at 40 Foley Square, New York, New York 10007, for the entry of an order dismissing Plaintiff's Complaint with prejudice pursuant to Federal Rule of Civil Procedure 12(b)(6).

Dated: October 15, 2021
New York, New York

Respectfully submitted,
PERKINS COIE LLP

/s/ Debra R. Bernard
Debra R. Bernard (*admitted Pro Hac Vice*)
131 S. Dearborn Street, Suite 1700
Telephone: 312.324.8400
Facsimile: 312.324.9400
dbernard@perkinscoie.com

-and-

Jeffrey D. Vanacore, Esq.
1155 Avenue of the Americas New York,
New York 10036-2711
Tel: 212.262.6900
Fax: 212.977.1642
jvanacore@perkinscoie.com

Attorneys for Global Strategy Group, LLC